

**Robertson, Heather P.**

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**From:** Walker, Leita <WalkerL@ballardspahr.com>  
**Sent:** Wednesday, March 23, 2022 4:32 PM  
**To:** Robertson, Heather P.  
**Cc:** Salomao Nascimento, Isabella; megan.renslow@lawmoss.com  
**Subject:** RE: [EXTERNAL] Response to Subpoenas to Mannix and Nesterak

Hi, Ms. Robertson, in part because of the teacher strike my schedule is a bit tight this week but I could talk Friday from 9-10, 11-11:30 or after 4 pm. Also, the Reformer has now retained separate counsel, copied here, and I assume you'll reach out to them separately.

Leita

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**From:** Robertson, Heather P. <Heather.Robertson@minneapolismn.gov>  
**Sent:** Wednesday, March 23, 2022 3:38 PM  
**To:** Walker, Leita (Minn) <WalkerL@ballardspahr.com>; Sarff, Kristin R <Kristin.Sarff@minneapolismn.gov>; Enslin, Sharda <sharda.enslin@minneapolismn.gov>  
**Cc:** Salomao Nascimento, Isabella (Minn) <salomaonascimentoi@ballardspahr.com>  
**Subject:** RE: [EXTERNAL] Response to Subpoenas to Mannix and Nesterak

 **EXTERNAL**

Ms. Walker,

Thank you for your letter and for the listing of publicly available articles and social media postings. The cases you cite do not relate to the situation at hand where we are not inquiring into Mr. Mannix's or Mr. Nesterak's sources or work product but are seeking information that they possess because they were first-hand witnesses to their own treatment as journalists by law enforcement during this period of civil unrest. What they wrote in their tweets and articles is an insufficient substitute for deposition testimony. Please advise when you are available tomorrow to meet and confer regarding your clients' appearance for a deposition next week.

Thank you and I look forward to speaking with you.

Heather Robertson  
Assistant Minneapolis City Attorney  
Minneapolis City Attorney's Office  
City Hall, Room 210  
350 South 5th Street  
Minneapolis, MN 55415  
612-673-3949

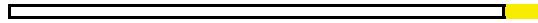
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**From:** Walker, Leita <[WalkerL@ballardspahr.com](mailto:WalkerL@ballardspahr.com)>  
**Sent:** Wednesday, March 23, 2022 3:01 PM  
**To:** Sarff, Kristin R <[Kristin.Sarff@minneapolismn.gov](mailto:Kristin.Sarff@minneapolismn.gov)>; Robertson, Heather P. <[Heather.Robertson@minneapolismn.gov](mailto:Heather.Robertson@minneapolismn.gov)>; Enslin, Sharda <[sharda.enslin@minneapolismn.gov](mailto:sharda.enslin@minneapolismn.gov)>  
**Cc:** Salomao Nascimento, Isabella <[salomaonascimentoi@ballardspahr.com](mailto:salomaonascimentoi@ballardspahr.com)>  
**Subject:** [EXTERNAL] Response to Subpoenas to Mannix and Nesterak

Counsel, please see attached correspondence regarding the above-referenced subpoenas.

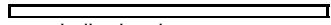
Sincerely,

**Leita Walker**



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